

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Telecommunications Relay Services)	CG Docket No. 03-123
And Speech-to-Speech Services for)	
Individuals with Hearing and Speech)	
Disabilities)	
)	
Petition for Rulemaking to Mandate)	
Captioned Telephone)	

Comments of Dana Mulvany, MSW

These comments are written in support of the Petition for Rulemaking to Mandate Captioned Telephone Relay Service and Approve IP Captioned Telephone Relay Service.

I write these comments as a hard of hearing individual who herself uses CapTel and who recently began using 2-line CapTel, presently the only form of captioned telephone available. I have also been a member of Self Help for Hard of Hearing People since 1984 and have encountered countless numbers of people with hearing loss who have difficulty hearing on the telephone. For several years in the late 1990s, I represented hard of hearing people on the California Equipment Program Advisory Committee for the California Deaf and Disabled Telecommunications Program, and provided information about two-line VCO on my personal web page.

My own hearing loss is profound at the middle and high frequencies used for speech. I cannot hear the difference between consonants such as “m” and “n” or “f” and “s” or “p” and “t” or “b” and “d” and I usually have considerable difficulty deciphering names, addresses or unfamiliar

words over the telephone through hearing alone. I have considerable difficulty understanding speech from many individuals, particularly if their voice is high-pitched or raspy, or if they have an accent. I normally utilize speechreading in conjunction with listening to help me understand speech, but speechreading is currently not available over landline telephones. Like that of most people with hearing loss, my hearing at the low frequencies in the speech range is much better than at the high frequencies, and I can hear inflections, emphasis, and many other non-verbal aspects of speech, which is importantly for understanding the complete meaning of what people say.

I have found CapTel very helpful for facilitating numerous telephone conversations. Many people who provide customer service support have accents which severely impact my ability to understand their speech, and without CapTel, I would have extremely difficulty understanding them. With 2-line CapTel, I can engage captioning only when I need it, merely by pushing the Caption button on the phone. (I do not use CapTel with individuals I already know I can understand well.)

Of critical importance is the ability to use 2-line CapTel for incoming calls. I can answer a call on a cordless phone and if I have trouble understanding the caller, I can walk over to my CapTel phone and use it to provide captions for the call. (I pick up the handset of the CapTel phone and make sure the call is connected, then press the Caption button to initiate the outgoing call which engages the CapTel relay service, which begins providing the service when the other party starts talking.) Before I set up 2-line CapTel, I had received calls that had been completely unintelligible to me. It was extremely disturbing to have no idea what the caller was talking about and to have no way of correcting the situation (the callers could not make their speech more intelligible to me despite my requests of them to slow down and speak more clearly). It is very important for other Americans with similar difficulties to have the ability to decipher incoming phone calls.

One reason why CapTel has been so useful is that it is easy and quick to use, and it enables people with partial hearing to maximize the use of their residual hearing and to hear the other person's voice. I have encountered many people with severe hearing loss who had given up using the phone on their own; they did not find traditional VCO

acceptable, which cuts off the ability to hear the other person's voice, and they could not handle the complexity of two-line VCO (which requires two different devices and three-way calling on the voice line). Captioned telephone allows hard of hearing people to continue using what hearing they do have, which is often the best and most efficient way they communicate, even if it is imperfect, while providing captions for the words they cannot understand otherwise; captioned telephone thus provides much greater functional equivalence to telephone communication than other forms of relay services. For people with partial hearing, relay services which cut off auditory access to voice are not able to provide full access to the important non-verbal aspects of speech (which modify the meaning of the words that are said) and thus are diminished in their ability to provide functional equivalence.

I support the request that *captioned telephone using Internet connections or transmissions, once available, will be eligible for cost recovery from the Interstate TRS fund*. This would help keep costs down and would ideally also enable people with hearing loss to use telephones in many more places than they can now. I myself have a wireless phone with SMS, email and unlimited web-surfing capabilities; I also have a WiFi connection at home and a WiFi-enabled notebook computer. If I and others could easily use Internet-connected computers or wireless phones to receive captions whenever needed, that would greatly enhance our ability to communicate effectively---which also benefits the people with whom we communicate.

I very much encourage the *development of standards for captioned telephone*. I would add that the captioned telephone technology should support basic punctuation such as commas, periods or semi-colons, which is frequently missing for voice mail offering numerous options. There also needs to be a method made available on the Internet of providing feedback about specific calls so the quality of service can be monitored and improved; the FCC should reserve the right to review such feedback to ensure that the provider is taking appropriate action to improve the quality of service, and the service provider should write a publicly available report on a quarterly basis explaining what it is doing to monitor and improve quality of service.

In addition to the requests made in the original petition, I would like to make another request. In order to manage the costs of captioned telephone well and also to provide functional equivalence to telephone communication, it is extremely important for the FCC to *support captioning on demand* (currently provided through 2-line CapTel) as this will encourage the use of relay services at any time when it is needed---but only when it is needed—in all areas under its jurisdiction. For this reason, all states and Universal Lifeline Telephone Service programs should encourage and if at all possible **subsidize** the use of the additional technology that is required to facilitate the use of captions on demand. (In some states, low-income people with disabilities may **lose** their eligibility for universal lifeline service if they add a second line for use with relay services, which can end up multiplying their phone costs six times and cause them to drop the service; the state policy denies functional access to telephone service and contradicts the purpose of the Universal Lifeline Telephone program.) One unfortunate drawback of using any relay service that cannot be engaged or disengaged upon demand is that when the user is put on hold for an indefinite period of time, the relay service is still engaged and is presumably still being paid, which is an inefficient and costly use of the relay service. I recently had to call E*Trade several times and was put on hold for very long periods of time, ranging from twenty-five to forty minutes; I also had to call an airline and was also put on hold for a very long time. I was at a residence without two phone lines and decided **not** to use CapTel relay in hopes I would understand the person who answered (although I did encounter trouble). Users of captioned telephone need to have the ability to keep costs down by engaging captions only when they are needed and disengaging them when they are not. Currently, no single-line relay service provides this capability without disrupting the entire call. Furthermore, people with severe hearing loss who cannot afford the addition of a second line need support for the costs of the second line from their federally-subsidized state universal lifeline telephone program; otherwise, they will be unable to understand the majority of incoming phone calls, such as reverse 911 and from everyone who does not call them through the CapTel relay service (such as doctors, Social Security representatives, tradespeople, and numerous other people who often cannot be reached by phone directly). “Caption on demand” can be absolutely essential for receiving critical information over the telephone. *I ask that the FCC to be proactive in supporting*

“caption on demand” in all areas under its jurisdiction, including the Universal Lifeline Telephone program.

Captioned telephone is an extremely important development for Americans with severe hearing loss. It can help remove barriers to employment, resolve numerous problems, and by enabling effective communication, improve health and help save lives. Thank you for your attention to this very important subject.

Sincerely,

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